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Attorney for Plaintiff  
 THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

THE REGENTS OF THE  
 UNIVERSITY OF CALIFORNIA,

Plaintiff,

vs.

INDEMNITY INSURANCE  
 COMPANY OF NORTH AMERICA,  
 DOES 1 TO 20,

Defendants.

Case No.: C 07 2721 PJH

**DECLARATION OF GARY  
 LEONARD IN SUPPORT OF  
 REGENTS' OPPOSITION TO  
 INDEMNITY INSURANCE  
 COMPANY'S MOTION TO  
 TRANSFER VENUE**

**Hearing Date: July 25, 2007  
 Time: 9:00 a.m.  
 Courtroom: 3**

**Assigned to the Honorable Phyllis J.  
 Hamilton**

I, Gary Leonard, declare:

1. I am a resident of the State of California and over the age of 18 years.

I am employed by the Regents of the University of California, Office of Risk  
 Services. My business address is 1111 Franklin Street, Oakland, California. I  
 make the statements herein of my own personal knowledge, or from knowledge

1 gained in the authorized course of my employment with the Office of Risk  
2 Services. If called upon to testify to the following matters at trial, I could  
3 competently do so.

4       2.     The present action involves a claim for insurance benefits under a  
5 Master Builders' Risk policy issued by Indemnity Insurance Company of North  
6 America ("Indemnity") to the Regents of the University of California (the  
7 "Regents").

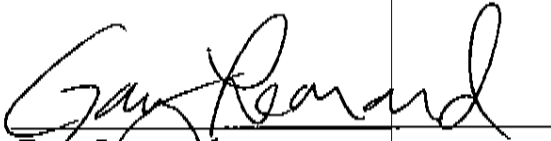
8       3.     The Regents' Office of Risk Services is located in Oakland, and is the  
9 centralized office responsible for the purchase of insurance for risks arising at or  
10 from the Regents' various properties and operations throughout the University of  
11 California system. At the time when this policy was purchased, the Regents' Chief  
12 Risk Officer was Hillary Trippe, who no longer works for the Regents but who I  
13 believe to be resident in northern California. The Regents does not have any  
14 employees in the Orange County/Los Angeles area who are authorized to purchase  
15 its insurance.

16       3.     The Master Builders' Risk policy was brokered by the AON insurance  
17 brokerage, through its San Francisco office. To my understanding, Regina Carter  
18 and Mimi Lee, both of whom were or are resident in the AON San Francisco  
19 office, were involved in the brokering and negotiations for the Master Builders'  
20 Risk policy. To my knowledge, there are no AON employees resident in the  
21 Orange County/Los Angeles area who were involved in the brokering of this  
22 Master Builders' Risk policy.

23       4.     This claim was initially tendered to Indemnity by personnel at AON.  
24 The Regents subsequently supplied documentation to Indemnity, which to my  
25 understanding is the extent of the initial investigation which Indemnity conducted.

1 Indemnity declined in a letter signed by an individual identified as John Adair,  
2 dated August 18, 2005. Mr. Adair was identified as an employee of ACE –  
3 Westchester Specialty Group, and his address was identified as Roswell, Georgia.

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5 DATED:

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7 Gary Leonard  
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